REMARKS

This is intended as a full and complete response to the Office Action dated February 7, 2007, having a shortened statutory period for response set to expire on May 7, 2007. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-41 are pending in the application. Claims 1-18, 20-22 and 27-42 remain pending following entry of this response. Claims 1, 7, 11, 14-16, 20-22 and 27-38 have been amended. Claims 19 and 23-26 have been cancelled. New claim 42 has been added to recite aspects of the invention. Applicants submit that the amendments and new claim do not introduce new matter.

Claims Objections

The Office Action notes that should claims 14-18 be found allowable, claims 19 and 23-26 will be objected to under 37 CFR 1.75 as being a substantial duplicate thereof. Claims 19 and 23-26 are herein cancelled. Claims 20 -22 are amended herein to depend from claim 14, instead of claim 19.

Claim Rejections - 35 U.S.C. § 112

Claims 9, 14, 19, 28 and 33 are rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the enablement requirement.

Applicants respectfully traverse this rejection.

In this case, the specification does describe "calling context information uniquely identifying the selected target call site," in such a way as to enable one skilled in the art to make or use the invention. FIG. 3 of the application illustrates line 28 containing the code, "widget = this.getWidget(tool.foo1(), widget.foo2())," where tool and widget are objects of the same type. Further, FIG. 3 illustrates the target call site 304 as widget.foo2() on line 28. (Application, pars. 51-52). For argument's sake, assume that

the tool object calls the same method as the widget object, i.e., (tool.foo1(), widget.foo1()).

In one embodiment of the invention, the line number of the call site is mapped to "*calling context information,*" that will appear on the call stack 120, e.g., a *statement number, or address*. (Application, par. 59). The calling context information is not a line number, as asserted in the Office Action, but information that will appear on the call stack 120. It is well-known in the art that the call stack will contain the statement numbers or addresses of executable code, not the line numbers of un-compiled source code. Further, as is also well-known in the art, the code on line 28 of FIG. 3 would necessarily be compiled into several executable statement, most importantly generating unique statement numbers for calls to each of tool.foo1() and widget.foo1().

Hence, the specification describes mapping *from* the line number of the source code *to* calling context information of the selected target call site. In this example, for the selected target call site, line 28 of the source code maps to the statement number of the executable code for widget.foo1(), not line 28 of the un-compiled source code. Therefore, the calling context information uniquely identifies the selected target call site, as required by claim 14.

Applicants submit that claim 14 is allowable and respectfully request withdrawal of the rejection. Claims 9, 28, and 33 contain limitation similar to those of claim 14, and are therefore allowable for at least the reasons stated above. Applicants respectfully request withdrawal of these rejections and allowance of the claims.

Claims 14, 19 and 33 are rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Applicants appreciate Examiner's observation and propose amendments to claims 14 and 33 in line with Examiner's suggestion. Applicants respectfully submit that the claims are allowable and request withdrawal of the rejections.

Claims 11, 15, 16, 16, 24, 30, 33, and 35 are amended to address issues with antecedent basis. Applicants respectfully submit that the claims are allowable and request withdrawal of the rejections.

Claim Rejections - 35 U.S.C. § 101

Claims 27 and 33 are rejected under 35 U.S.C. 101 because the claimed invention is directed to non-statutory subject matter.

Claims 27 and 33 are amended herein to claim, "computer readable *storage* medium." As amended, Applicants believe claims 27 and 33 are limited to statutory subject matter. Applicants respectfully submit that the claims are allowable and request withdrawal of the rejections. If Examiner maintains the rejection, Applicants kindly request Examiner's suggestion as to how the rejection may be overcome.

Claim Rejections - 35 U.S.C. § 102

Claims 1-2 and 38-39 are rejected under 35 U.S.C. 102(b) as being anticipated by *Bates et al.* (U.S. 6,077,312, hereinafter, "*Bates*").

Applicants respectfully traverse this rejection.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

In this case, *Bates* does not disclose each and every element of amended claims 1 and 38. Specifically, Claim 1 recites a method for debugging code that includes "upon determining that the execution path has arrived at the routine, halting execution of the code and performing a step into operation to step into the routine." Claim 38 recites a similar step.

Bates does not disclose this limitation. More specifically, *Bates* teaches conditionally halting execution when runtime conditions meet a predetermined criteria. However, claims 1 and 38 respectively recite halting and interrupting execution, and then automatically performing a step into operation to step into the routine, which is discussed nowhere in *Bates*.

Claim Rejections - 35 U.S.C. § 103

Claims 3 and 40 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Bates*.

Claims 4-18, 21-37, and 41 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Bates* in view of *Arnold et al.* (U.S. Publication No. 2003/01067046, hereinafter, "*Arnold*").

Claims 15, 23, and 34 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Bates* in view of *Arnold* further in view of *Paterson* (U.S. Patent No. 5,050,168).

Claims 4-6 depend from claim 1, which Applicants believe is allowable for the reasons given above.

The Examiner bears the initial burden of establishing a *prima facie* case of obviousness. *See* MPEP § 2142. To establish a *prima facie* case of obviousness three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one ordinary skill

in the art, to modify the reference or to combine the reference teachings. Second, there must be a reasonable expectation of success. Third, the prior art reference (or references when combined) must teach or suggest all the claim limitations. *See* MPEP § 2143. In this case, the combined references fail to meet the third criteria.

Specifically, the combination of references does not teach or suggest each and every element of amended claims 7, 14, 27, and 33, which are amended herein to include the limitation of "performing a step into operation to step into the routine," discussed in the Application at paragraph 32. The step into operation is not taught or suggested in any of the references cited in the Office Action. Specifically, *Bates* teaches conditionally halting execution when runtime conditions meet a predetermined criteria. However, claims 7, 14, 27, and 33 recite, "halting execution ... and then automatically performing a step into operation to step into the routine," which is discussed nowhere in *Bates*, nor the other references.

Therefore, claims 4-18, 21-37 and 41 are believed to be allowable, and allowance of the claims is respectfully requested.

<u>Conclusion</u>

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted, and
S-signed pursuant to 37 CFR 1.4,

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